

# Exhibit G

REINTJES V KAISER	2016	MEADOWS	CALIFORNIA	D	D/A
SPEEG V 24 HOUR FITNESS	2016	JOHNSON, ASHLEY	CALIFORNIA	D	D
GEIGER V AMCORD	2016	CAPISTRON	CALIFORNIA	D	D
MENDOZA V KAISER	2016	TROTTER	CALIFORNIA	D	D/A
HAGAN V TORRANCE MED CTR	2016	MOORE	CALIFORNIA	D	D
MIDANI V KAISER	2016	BOOTH	CALIFORNIA	D	D
LANTHIER	2016	PARTIDA	CALIFORNIA	D	D
BURGER	2016	PARTIDA	CALIFORNIA	D	D
KIRSNIS V KAISER	2016	CARROLL	CALIFORNIA	D	D/A
SCHISZLER	2016	BERKES	CALIFORNIA	D	D/T
JONES	2016	BECKLEY	CALIFORNIA	D	D
STIRRAT	2016	ABGARYAN	CALIFORNIA	D	D
SNYDER V UC REGENTS	2016	YARVIS	CALIFORNIA	D	T
OLSON	2016	BAVARAIAN	CALIFORNIA	D	D
PONZIO	2016	GUTIERREZ	CALIFORNIA	D	D
BAKSH V KAISER	2016	LAW	CALIFORNIA	P	D
YAGODA V WOOD	2016	YAGODA	ILLINOIS	P	D
DESINOR	2016	COHEN	FLORIDA	P	D
STEPHENSON	2016	BEHM	MICHIGAN	P	T
KURTZ V AMCORD	2017	CAPISTRON	CALIFORNIA	D	D
SERAFIN	2017	NAGAYAMA	CALIFORNIA	D	D
CERVANTES	2017	ABGARYAN	CALIFORNIA	D	D
HUKKANEN	2017	CORBLY	CALIFORNIA	D	D
HOLTSCRAW	2017	WEISS	CALIFORNIA	D	D
VILLALOBOS	2017	SNYDER	CALIFORNIA	D	D
HART	2017	ROBLES	CALIFORNIA	D	D
HAWKINS	2017	LEASE	CALIFORNIA	D	D
CERVANTES	2017	ABGARYAN	CALIFORNIA	D	D
SERAFIN	2017	LEASE	CALIFORNIA	D	D
SMITH V TERUMO	2017	LIFTON	FLORIDA	D	D
VILLALOBOS	2017	SNYDER	CA	D	D
TRUFFA	2017	ABGARYAN	CA	D	D
SALAZAR	2017	SIU	CA	D	D
MINNEY	2017	COULSTON	CA	D	D
ROBINSON V FREEPORT MEMORIAL	2017	YAGODA	ILLINOIS	P	D
BARTUNEK	2017	HAIGH	SOUTH DAKOTA	D	T
KOCAN	2017	LOUGHREN	PA	P	A
BARTOLI	2017	CAPISTRON	CA	D	D
ABY	2017	CAPISTRON	CA	D	D
GIBBONS	2017	WOODWARD	CA	D	D
RIGOR	2017	HOLLERAN	CA	D	D
DUNEK V THUMATI	2017	CAHILL	CA	D	D
SHELBY	2018	CAPISTRON	CA	D	D
SOUTHERLAND	2018	CAHILL	CA	D	D
BIANES	2018	STOUT	CA	D	D

DIASO	2018	EHRENPFORT	CA	D	D
CARBON	2018	MEHLING	CA	D	D
MYERS	2018	HASKINS	CA	D	D
CERASANI	2018	LEASE	CA	D	D
ABRAHAM-TANKS	2018	PARTIDA	CA	D	D/A
ROBINSON	2018	HICKS	CA	D	D
THRASH	2018	MEHLING	CA	D	D
LYTLE	2018	SAHAGUN	CA	D	D
WIGLESWORTH	2018	PARTIDA	CA	D	D
BAILEY	2018	MEHLING	CA	D	D
DIAZ V CARTER	2018	TROBOUGH	CA	D	D
MONTGOMERY V PACIFIC FAM MED	2018	AMO	CA	D	D
COOK	2018	ABGARYAN	CA	D	D
MCLEAREN	2018	LANDIS	CA	D	D
GARCIA PAUL	2018	JAUREGUI	CA	D	D
ROSENE	2018	TATE	CA	D	D
JACK	2018	PARTIDA	CA	D	D
MESSER V SANAULLAH	2018	Fontela	FLORIDA	D	D
FINLEY	2018	WONG	CA	D	D
BRADD	2018	SPANOS	CA	D	D
AVINA	2018	LEASE	CA	D	D
AGUIRE V EAST VALLEY	2018	STURGES	CA	D	D
KUNHARDT	2018	JOHNSTONE	FLORIDA	P	D/T
LONG	2018	SPANOS	CA	D	D
ALLEN V BEGOLE	2018	TROTTER	CA	D	D
HALE	2018	BLANCHER	CA	D	D
GODBER	2018	SIU	CA	D	D
TART	2018	TRAN	CA	D	D
CONROW	2018	LEASE	CA	D	D
SABETIAN	2018	CHUA	CA	D	D
HENSON	2018	JAUREGUI	CA	D	D
FATHIPOUR V TMMC	2018	GOETHALS	CA	D	D
DOYLE	2018	KIM	CA	D	D
GODBER	2019	VIIU	CA	D	T
BLAKE	2019	LUQUE	CA	D	D
MIDANI V KAISER	2019	CAHILL	CA	D	T
HILLIMAN	2019	CHUA	CA	D	D
KEEFE	2019	ABGARYAN	CA	D	D
SEMENTILLI	2019	SPANOS	CA	D	D
TETREAU V KAISER	2019	LAFFERTY	CA	D	D
PETERSEN	2019	TANNEN	FLORIDA	p	D
TETREAU V KAISER	2019	LAFFERTY	CA	D	A
SOUTHERLAND V MAJID	2019	CAHILL	CA	D	T
O'ROURKE	2019	PITTMAN	CA	D	D/T
COLE	2019	SPANOS	CA	D	D

BELL	2019	MOORE	CA	D	D
LIANG V REGENTS	2019	HOLMES	CA	D	D
WYSS	2019	SPANOS	CA	D	D
CONNAUGHTON	2019	MEHLING	CA	D	D
HIGGINS V PLMCC	2020	COONEY	CA	D	D
FLUCK	2020	LEASE	CA	D	D
BRAZIL	2020	SPANOS	CA	D	D
METZGER	2020	ALI	CA	D	D
JORDAN	2020	SPANGLER-KHARE	CA	D	T
FRANKLIN	2020	HOOKS	CA	D	D
KYLER	2020	VELOSO	CA	D	D
HAWKINS V CHAWLA MD	2020	KJAR	CA	D	D



*C. Alan Brown M.D., F.A.C.C.*

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SUBJ: JAMES LAFRENTZ

I am a clinical cardiologist currently serving as Chief Medical Information Officer (CMIO) for Cottage Health System in Santa Barbara, CA. From June 1983 to June 2015, I was a clinical and interventional cardiologist with the Santa Barbara Cardiovascular Medical Group. In June 2015 I transitioned from my clinical cardiology practice to my current position as CMIO at Cottage Health. I received my bachelor's degree from Dartmouth College in 1970 and medical degree from Harvard Medical School in 1974. I completed medical residency in 1976 at the Massachusetts General Hospital affiliated with Harvard Medical School and cardiac fellowship training in 1981, again at the Massachusetts General Hospital. I am board certified by the American Board of Internal Medicine in Internal Medicine and Cardiovascular Diseases. I was the director of the Cottage Hospital Coronary Care Unit from 1998 until June 2015. I am a Clinical Associate Professor of Medicine at the University of Southern California and was a medical officer in the United States Navy Reserve from 2002 until 2015. A copy of my Curriculum Vitae is attached for reference.

Based upon the foregoing education, training, and professional experience, including medical practice in the field of cardiology, I am qualified to provide expert opinions regarding the cardiology medical issues involving this matter.

Each of my opinions expressed in this report are to a reasonable degree of medical certainty.

#### RECORDS REVIEWED

1. C. Kelley Tibbels Medical
2. C. Kelley Tibbels Radiology
3. Cancer Center at Wise Health System
4. Neelima Maddukuri Medical
5. Neelima Maddukuri Radiology
6. Wise Health Clinic CT Surgery 2650
7. Wise Health Clinic Pulmonology Medical
8. Wise Health Clinic Pulmonology Pathology
9. Wise Health Clinic Pulmonology Radiology
10. Wise Health System Pathology
11. Wise Health System Radiology
12. Advanced Heart Care
13. Death Certificate

**BRIEF SUMMARY OF EVENTS:**

In 1994, Mr. James LaFrentz (DOB 11/24/44) suffered a myocardial infarction. Coronary angiography reportedly demonstrated a coronary artery occlusion and medical therapy was instituted.

On October 8, 2012, Mr. LaFrentz was hospitalized with hyperosmolar hyperglycemia due to diabetes mellitus. His past medical history was notable for poorly controlled diabetes mellitus type 2, hypertension, coronary artery disease and dyslipidemia. He was treated with insulin, simvastatin for dyslipidemia, and lisinopril for hypertension.

On April 7, 2014 he was evaluated at the Wise Health Clinic. Medical history included a long-standing history of COPD (chronic obstructive pulmonary disease) secondary to smoking, current smoking, diabetes, hyperlipidemia, congestive heart failure and hypertension.

During a return office visit at Wise Health Clinic on April 15, 2014, a general tendency toward being non-compliant with his diabetes regimen and apathy in regard to dietary and medication compliance was documented.

Similar documentation of diabetes regimen non-compliance was noted during evaluation at the Wise Health Clinic on July 26, 2016 and November 9, 2016.

On July 6, 2017, lower extremity arterial doppler study revealed occlusion of the proximal to mid-segment left superficial femoral artery and severe peripheral vascular disease involving the leg arteries bilaterally.

During a vascular surgery consultation on July 8, 2017, Mr. LaFrentz was documented to be a current smoker and not interested in quitting smoking.

On February 14, 2018 poor diabetes control was documented with a fasting blood sugar measuring 267.

An echocardiogram performed June 26, 2018 demonstrated severely reduced global left ventricular function with an estimated ejection fraction of 25-30%. Atrial fibrillation was also noted. Diastolic heart function could not be determined due to atrial fibrillation.

An Internal Medicine progress note dated June 28, 2018 documented a pulmonary mass, acute hypoxic respiratory failure, acute systolic dysfunction congestive heart failure, atrial fibrillation with rapid ventricular response, uncontrolled diabetes, history of peripheral vascular disease with stenting, history of COPD, history of coronary disease.

Mr. LaFrentz was seen for pulmonary consultation on July 5, 2018. He was noted to be an active smoker with a 55 pack-year smoking history. Physical examination documented BMI 32.4, BP 110/62, HR 115.

Repeat echocardiography July 13, 2018 again confirmed an estimated left ventricular ejection fraction of 25% with severe hypokinesis of the apex. Diastolic heart function could not be determined due to atrial fibrillation.

During an evaluation at Wise Health Clinic on August 14, 2018, increased weight and peripheral edema was noted during monitoring with the 360 Congestive Heart Failure Program. He continued to smoke heavily and compliance with dietary fluid intake was questionable.

In January 2019, Mr. LaFrentz was hospitalized after losing consciousness and was cardioverted from atrial fibrillation to sinus rhythm.

In March 2019, Mr. LaFrentz was hospitalized with influenza pneumonia.

Mr. LaFrentz expired on October 12, 2019 while in hospice.

#### DISCUSSION:

Mr. LaFrentz's cardiovascular conditions included atherosclerotic coronary artery disease with first myocardial infarction at age 50, diabetes mellitus type 2 with poor regimen compliance, hypertension, dyslipidemia, peripheral arterial disease, congestive heart failure with severe left ventricular dysfunction and atrial fibrillation. Additional risk factors for progressive atherosclerotic disease included obesity and a long history of cigarette smoking with resultant chronic obstructive pulmonary disease.

The Framingham Heart Study, a prospective long-term study initiated by the American Heart Association, demonstrated that men with hypertension live on average 5 years less than men without hypertension. Similarly, men with diabetes live 7.5 years less than men without diabetes.

In 1994, Mr. LaFrentz suffered a heart attack (myocardial infarction) at age 50. In 2018, a cardiac ultrasound demonstrated congestive heart failure with severely reduced heart function. Cardiac ultrasound is used to measure the left ventricular ejection fraction (LVEF), which can be considered the percentage of blood pumped by the left ventricle to the body. Normal LVEF ranges 50-70%; Mr. LaFrentz's LVEF measured only 25-30%. Such severe heart dysfunction is associated with heart failure, compromised blood flow to vital organs, and high risk of sudden cardiac death due to heart arrhythmia.

Atrial fibrillation is a cardiac arrhythmia (irregular heart rhythm) often seen in patients with hypertensive heart disease. In atrial fibrillation the upper heart chambers experience chaotic electrical signals that result in an irregular and often rapid heart rate. Patients may experience palpitations, shortness of breath and exercise intolerance. The chaotic rhythm may cause blood to pool in the heart's upper chambers and form clots, increasing the risk for stroke. Patients with atrial fibrillation require chronic anticoagulation with warfarin (Coumadin) or alternative anticoagulants, increasing their risk of bleeding complications as well. Atrial fibrillation has a marked impact upon cardiovascular life expectancy, in part due to direct risks associated with the condition but also through its association with significant underlying structural heart disease. In a 21-year community based study by the Mayo Clinic published in the Journal of the American College of Cardiology, average survival after diagnosis of atrial fibrillation was less than six years.

In consideration of the multiple cardiovascular conditions and risk factors mentioned above and to a reasonable degree of medical certainty, Mr. LaFrentz's cardiovascular life expectancy at the time of his death was one to two years.

A handwritten signature in black ink, appearing to read 'CAB', with a long horizontal flourish extending to the right.

C. Alan Brown MD FACC  
July 8, 2020

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10. Miyasaka, Y. "Mortality Trends in Patients Diagnosed with First Atrial Fibrillation." JACC 2007. 49:986-92.



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PERSONAL	Birth Date: May 20, 1949 Birthplace: Santa Monica, California	
EDUCATION	A.B., Dartmouth College Hanover, New Hampshire	1970
	B. Medical Science, Dartmouth Medical School Hanover, New Hampshire	1972
	M.D., Harvard Medical School Boston, Massachusetts	1974
	Medical Intern, Massachusetts General Hospital Boston, Massachusetts	1974-1975
	Medical Resident, Massachusetts General Hospital Boston, Massachusetts	1975-1976
	Research Fellow, Immunology, Department of Medicine Massachusetts General Hospital Boston, Massachusetts	1976-1977
	Clinical & Research Fellow, Cardiac Unit Massachusetts General Hospital Boston, Massachusetts	1978-1981
BOARD CERTIFICATIONS	American Board of Internal Medicine, Internal Medicine American Board of Internal Medicine, Cardiovascular Disease American Board of Internal Medicine, Interventional Cardiology	1978 1981 2000-2010

## PROFESSIONAL

Santa Barbara Medical Foundation Clinic Practicing Cardiologist Santa Barbara, California	1981-1983
Director, St. Francis Hospital Coronary Care Unit Santa Barbara, California	1983-1988
President, Santa Barbara Chapter American Heart Association	1989-1990
Board of Directors, California Preferred Providers Santa Barbara, California	1984-1992
President, Adult Continuing Education Council Santa Barbara Community College Santa Barbara, California	1991-1993
Board of Directors, St. Francis Medical Center Santa Barbara, California	1994-1996
Board of Directors, Monarch Health Systems Santa Barbara, California	1992-1999
President, Santa Barbara Chapter American Heart Association	1997-1998
Board of Directors, Santa Barbara Select IPA Santa Barbara, California	1997-1999
Board of Directors, California Affiliate, American College of Cardiology	1997-1999
Co-Director, Medical Advisory Panel to the Board of Trustees, Santa Barbara Cottage Health System	2002-2005
Board of Directors, Navy League Santa Barbara Chapter	2003-2005
Board of Directors, Santa Barbara Chapter American Heart Association	1983-2006
Secretary, Medical Staff Executive Committee, Santa Barbara Cottage Hospital	2005-2007
Battalion Surgeon, 4 <sup>th</sup> MARDIV 2/23 Marine Corps Reserve Infantry Battalion	2004-2009
Battalion Surgeon, 4 <sup>th</sup> LAR, 1 MEF 4 <sup>th</sup> Light Armored Reconnaissance Battalion Operation Enduring Freedom, Afghanistan	2009-2010

Battalion Surgeon, 4 <sup>th</sup> MARDIV 2/23 Marine Corps Reserve Infantry Battalion	2010-2011
Regimental Surgeon, 4 <sup>th</sup> MARDIV 23 <sup>rd</sup> Regiment Marine Corps Reserve Infantry Regiment	2011-2014
Medical Officer, United States Navy Reserve Captain, United States Navy	2002-2017
Director, Santa Barbara Cottage Hospital Coronary Care Unit Santa Barbara, California	1998-2015
Santa Barbara Cardiovascular Medical Group, Inc. Clinical and Interventional Cardiologist Santa Barbara, California	1983-2015
Associate Clinical Professor of Medicine University of Southern California School of Medicine	1993-Present
Chief Medical Information Officer Cottage Health Systems Santa Barbara, California	2012-Present

#### **LICENSES**

California

#### **MEMBERSHIPS & AWARDS**

Rufus Choate Scholar, A.B. Cum Laude Dartmouth College	1970
Massachusetts Medical Society Harvard Medical School Dean's Award	1974
Alpha Omega Alpha Medical Honor Society Harvard Medical School	1974
National Kidney Foundation Fellowship Award	1975
National Institute of Health Individual Fellowship Award in Cardiology	1976
Diplomate, American Board of Internal Medicine	1977
Paul Dudley White Fellowship in Cardiology Massachusetts Chapter, American Heart Association	1978
Diplomate, American Board of Internal Medicine Cardiovascular Subspecialty	1982
Fellow, American College of Cardiology	1983

Interventional Cardiology Subspecialty Certification American Board of Internal Medicine	2000-2010
Teacher of the Year Award Santa Barbara Cottage Hospital Medical Residency Program	2002
Excellence in Teaching Award Santa Barbara Cottage Hospital Medical Residency Program	2003
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Excellence in Teaching Award Santa Barbara Cottage Hospital Medical Residency Program	2008
Excellence in Teaching Award Santa Barbara Cottage Hospital Medical Residency Program	2009
Hospital Hero Award Southern California Hospital Foundation	2011
Bronze Star Battalion Surgeon, 4 <sup>th</sup> Light Armored Reconnaissance Battalion, 2 <sup>nd</sup> Marine Expeditionary Force, United States Marine Corps, Operation Enduring Freedom, Helmand Province, Afghanistan	2011
Excellence in Teaching Award Santa Barbara Cottage Hospital Medical Residency Program	2014
Excellence in Teaching Award Santa Barbara Cottage Hospital Medical Residency Program	2015
Physician of the Year Award Santa Barbara Cottage Hospital	2016

**C. Alan Brown, MD**  
**PUBLICATIONS**

1. Brown, C.A., Hall, C.L., Long, J.C., et al: Circulating Immune Complexes in Hodgkin's Disease. *AM. J. Med.* 64:289-294, 1978.
2. Long, J.C., Hall, C.L., Brown, C.A., et al: Binding of Soluble Immune Complexes in Sera of Patients with Hodgkin's Disease to Tissue Cultures Derived from the Tumor. *New Engl. J. Med.* 297:2950-299, 1977.
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C. Alan Brown MD  
ABSTRACTS

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